Before The
Federal Communications Commission
Washington, D. C. 20554

In the Matter of	
Numbering Resource Optimization	CC Docket No. 99-200

Supplemental information, Please append:

WE, THE PEOPLE OF THE STATE OF CALIFORNIA, AND BY PROXY FOR THE CALIFORNIA PUBLIC UTILITIES COMMISSION THEREIN, PETITION THE FEDERAL COMMUNICATIONS COMMISSION FOR A WAIVER TO IMPLEMENT THE FULL SET OF HEXADECIMAL DIGITS AS PHONE NUMBERS IN A NEW INDUSTRY CLASS OF SERVICE IN ALL AREA CODES WHILE STILL MAINTAINING NANP COMPLIANCE AND THAT IS ACCOMPLISHED WITHOUT ANY PARTIES INCURRING ANY COSTS

AREA CODE TERMINOLOGY - Split, Overlay, and Partition.

You don’t need a NEW AREA CODE, read why:

Like so many things in life, the definition of an Area Code and its manipulation terminology is alive and changing. This writing is an attempt to clear up several misconceptions and to introduce new terms absolutely necessary to discuss this issue.

We will very carefully use the term decimal and hexadecimal as a proper addition to every Area Code, Prefix, and Line Number. Area Codes existing today, including 213, 415, 212, and so on are DECIMAL AREA CODES. Area Codes of the form 310, 909, 202, and so on are HEXADECIMAL AREA CODES.

Nothing prevents the use of a hexadecimal Prefix in a decimal area code and similarly, nothing prevents the use of a decimal Prefix in a hexadecimal area code. This same concept applies equally well to Line Numbers.

Needless to say, when the nation expands the use of hexadecimal phone numbers as proposed in the HEXADECIMAL SOLUTION there will be a learning curve and the difficulties associated with it are lessened by assignments of the most familiar number styles.

When the reader attempts to analyze the benefits derived from introducing a decimal or hexadecimal prefix, extra care is required to establish just what benefit is produced.

CURRENT DEFINITIONS

SPLIT - this is geographic - To split an existing geographic area being served by a single decimal or hexadecimal area code into two geographically separate areas each being served by a decimal or hexadecimal area code. Generally this split is about half keeping the original decimal or hexadecimal area code, with the other half getting a new decimal or hexadecimal area code. An example close to home is the unnecessary but pending 310/424 area code split. Here the current

phone subscribers in the South Bay will change from a hexadecimal 310 area code to a decimal 424 area code.

None of the tremendous advantages offered by the HEXADECIMAL SOLUTION will be realized in this split, because the use of hexadecimal prefixes and hexadecimal line numbers have not yet been implemented in either of the decimal or hexadecimal area codes. Had this been done no split would be necessary at all.

CONSUMPTION: Uses a new decimal or hexadecimal area code, further depleting the supply.

ADVANTAGE: None is realized with this form of area code manipulation.

DISRUPTION: Requires all subscribers getting the new decimal or hexadecimal area code to print new stationery, change ads, paint new signs and other expensive personal and business disruptions that are required to alert the public of the new decimal or hexadecimal area code.

DIALING: The subscribers will dial the same way as before the split.

OVERLAY - this is geographic - To overlay an existing geographic area being served by a single or multiple decimal or hexadecimal area codes into one geographically combined area being served by the original decimal or hexadecimal area codes and this new decimal or hexadecimal area code. Generally this overlay is covering just one decimal or hexadecimal area code, but no limit exists. An example is the toll free 800 service that is an overlay of the entire nation, all states, all area codes.

None of the tremendous advantages offered by the HEXADECIMAL SOLUTION will be realized in this overlay, because the use of hexadecimal prefixes and hexadecimal line numbers have not yet been implemented in either of the decimal or hexadecimal area codes.

CONSUMPTION: Uses a new decimal or hexadecimal area code, further depleting the supply.

ADVANTAGE: None is realized with this form of area code manipulation.

DISRUPTION: Requires all subscribers getting the new decimal or hexadecimal area code to print new stationery, change ads, paint new signs and other expensive personal and business disruptions that are required to alert the public of the new decimal or hexadecimal area code.

DIALING: The subscribers will now need to dial the entire decimal or hexadecimal area code and prefix and line number for each call placed, because the business next to one another are able to have the same prefix and line numbers, but be in entirely different decimal or hexadecimal area codes.

PARTITIONING - this is NOT geographic - To partition the users and applications of subscribers, not the geographic area being served by a single decimal or hexadecimal area code, into the designations of Voice or Non-voice and to fully implement the HEXADECIMAL SOLUTION within the Industry class of service.

We strongly support the Voice designation as it applies to both wireline and wireless services. Primary use of these Public Decimal Phone numbers is to be

limited to voice subscribers where a person dials the number using all existing phone instruments.

Non-voice subscribers will be provided service in two additional Industry applications in what has become known as Public Hexadecimal Phone numbers for pagers and faxes. Where as an example, the hexadecimal phone number of 67*-1234 would be for pager uses and the hexadecimal phone number of 21#-5678 would be used for faxes, both of which can be dialed with existing telephone instruments. If your business has the decimal phone number of 310/377-5790 a good choice would be 310/377-579# for your fax.

Private Hexadecimal Phone numbers within the Industry class of service are for such services as ATMs, alarm systems, POS transactions, elevator phones, weather stations computer modems and the like that are electronically dialed and are accommodated with Private Hexadecimal Phone numbers such as 310/23E-4567 that can not be dialed with the public phone, but can with the lineman test set and special hexadecimal phones for use by emergency agencies.

All of the tremendous advantages offered by the HEXADECIMAL SOLUTION will be realized in this expansion, because the use of hexadecimal prefixes and hexadecimal line numbers have been implemented in the decimal or hexadecimal area codes.

CONSUMPTION: Uses the existing decimal or hexadecimal area code, expanding the number base from 10 million to 230 million tremendously increasing the supply of available numbers all for free, since the telephone computers are already hexadecimal and the public already paid for the Touch Tone system 20 years ago.

ADVANTAGE: All advantages are realized with this form of area code manipulation.

DISRUPTION: Requires no subscriber to do anything. This partitioning is entirely transparent.

DIALING: The Public subscribers will dial the same way as before the partitioning.

PRIVATE: Some numbers will become Private Hexadecimal numbers that are very welcomed by business and industry, since the general public will not be able to dial them without a special attachment to their existing phone.
Keep in mind that these hexadecimal numbers are not intended to be dialed by the public and in fact cause major problems to computer systems when they are misdialed into by mischievous members of the public.

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